

EXHIBIT P

Keith Flynn

From: Miglio, Terrence J. <tjmiglio@varnumlaw.com>
Sent: Friday, March 27, 2015 2:44 PM
To: Keith Flynn
Subject: RE: Reeser

I will not sign the order. As usual, everything is more difficult with you. I told you I would agree to allow you to take her dep after discovery. I am not holding anything hostage. And give me dates when your client can appear for her continued dep.

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From: Keith Flynn [mailto:kflynn@millercohen.com]
Sent: Friday, March 27, 2015 2:37 PM
To: Miglio, Terrence J.
Subject: RE: Reeser

What do you mean you don't control her? You unilaterally cancelled her deposition. You have accepted service on her behalf. You have indicated to me on several occasions both through email and in pleadings that all communication with Jill Hood should be made through your office. Now, you are saying that you don't control her?

This is the very reason why I am insisting on a stip and order because your written promises without a Court order seem insufficient.

Furthermore, you are attempting to hold Plaintiff's discovery efforts hostage to your request for an extension of the summary judgment deadline based on a "scheduling conflict" that you have never identified that changed from half-a-day to a whole day. Plaintiff was kind to even entertain discussions regarding rescheduling the deposition considering that this date was picked by you and Ms. Hood in exchange for scheduling Ms. Reeser's deposition on the 23rd. You knew from the beginning that I was requesting a full day. This issue was created by you.

Please confirm that you intend to sign the stipulated order that I presented to you for your review or I will be forced to file a motion.

- Keith

From: Miglio, Terrence J. [mailto:tjmiglio@varnumlaw.com]

Sent: Friday, March 27, 2015 2:15 PM

To: Keith Flynn

Subject: RE: Reeser

And I am not going to agree to an order requiring Ms. Hood to show up for her deposition. I don't control her. I told you that I agree to allow you to take her dep after discovery.

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From: Keith Flynn [mailto:kflynn@millercohen.com]

Sent: Friday, March 27, 2015 1:36 PM

To: Miglio, Terrence J.

Subject: RE: Reeser

Terrence:

I have not heard anything back from you regarding this issue. While I do not understand the distinction raised in your email, I am willing to alter the language of the stipulated order to reflect that it is an agreement to take and use Ms. Hood's deposition after the discovery cutoff and pursuant to the court rules.

Once again, the discovery cutoff is looming. If we do not resolve this matter by the end of the day, I will be tempted to file a motion to preserve my client's rights.

Please review and state whether you consent to the language in the stip and order.

Thanks.

- Keith

From: Keith Flynn
Sent: Friday, March 27, 2015 10:34 AM
To: 'Miglio, Terrence J.'
Subject: RE: Reeser

The stipulated order that I sent you yesterday only extends discovery for the purpose of taking Ms. Hood's deposition. Could you clarify the distinction that you are making in regards to just agreeing to take her deposition after discovery as opposed to what is in the stipulated order?

Thanks.

- Keith

From: Miglio, Terrence J. [<mailto:timiglio@varnumlaw.com>]
Sent: Friday, March 27, 2015 10:11 AM
To: Keith Flynn
Subject: RE: Reeser

If we are going to extend discovery and not just agree to take her deposition after discovery, then we need to extend the dispositive motion cutoff date.

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From: Keith Flynn [mailto:kflynn@millercohen.com]
Sent: Thursday, March 26, 2015 11:56 AM
To: Miglio, Terrence J.
Cc: Buchanan, Barbara E.
Subject: RE: Reeser

Terrence:

I have attached the draft stipulated order regarding Ms. Hood's deposition. Please state whether you concur and provide me with authority to sign on your behalf.

Thank you.

- Keith

From: Keith Flynn
Sent: Thursday, March 26, 2015 11:22 AM
To: 'Miglio, Terrence J.'
Cc: 'bebuchanan@varnumlaw.com'
Subject: RE: Reeser

I just spoke with your paralegal, Joanne, regarding the matter discussed below. She indicated that the deposition of Ms. Hood is not going tomorrow. She told me that you were going to get additional dates of availability and that you were agreeable to a stipulated order extending discovery for the sole purpose of taking Ms. Hood's deposition.

I will forward the draft stipulated order to you later today.

Also, I have not heard back regarding the stipulated protective order. Obviously, the discovery cutoff is soon approaching. I will need a decision on that issue sooner rather than later.

- Keith

From: Keith Flynn
Sent: Thursday, March 26, 2015 9:55 AM
To: 'Miglio, Terrence J.'
Cc: 'bebuchanan@varnumlaw.com'
Subject: RE: Reeser

Terrence:

I have a court reporter waiting on standby. I would like to accommodate Ms. Hood's schedule as much as possible and I certainly hope to provide the court reporter with notice of this change as soon as possible. However, I cannot reschedule Ms. Hood's deposition without your confirmation that I will be able to depose Ms. Hood on another mutually convenient date without running afoul of the Court's Scheduling Order. I need an answer as soon as possible regarding Ms. Hood's availability or Defendant's willingness to sign a stipulated order today extending the discovery period for the sole purpose of taking Ms. Hood's deposition.

If I do not hear back from you by 2pm, I cannot reschedule the deposition. I will continue under the assumption that Ms. Hood will appear for the full-day deposition scheduled for tomorrow that I requested over a month ago.

Please advise.

Thanks.

- Keith

From: Miglio, Terrence J. [mailto:tjmiglio@varnumlaw.com]
Sent: Wednesday, March 25, 2015 12:23 PM
To: Keith Flynn
Subject: RE: Reeser

I will check with her for her availability.

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From: Keith Flynn [mailto:kflynn@millercohen.com]

Sent: Wednesday, March 25, 2015 12:21 PM

To: Miglio, Terrence J.

Subject: RE: Reeser

My schedule is incredibly busy in the next couple of weeks—I have an arbitration hearing coming up the first week of April. The only day that I am available next week without rescheduling other meetings is Monday. However, I am definitely going to need a full day with Ms. Hood. Please let me know if Monday works.

Thanks.

- Keith

From: Miglio, Terrence J. [<mailto:tjmiglio@varnumlaw.com>]
Sent: Wednesday, March 25, 2015 10:21 AM
To: Keith Flynn
Subject: Reeser

Jill Hood informs me that she is only available Friday morning. She said she can start early on that day. I am trying to reach her to see her actual availability that day. If Friday morning starting early won't provide you with enough time I will get alternate dates from her but it would be easier if you let me know your availability.

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